IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

BETH CHANEY MACNEILL	§	
Plaintiff	§	
	§	
VS.	§	
	§	
	§	CIVIL ACTION NO. 4-14CV-242-0
NIRMAL JAYASEELAN, M.D. and TEXAS	§	
HEALTH HARRIS METHODIST	§	
HOSPITAL FORT WORTH	§	
	§	
	§	
	§	
Defendants		

PLAINITIFF'S INITIAL DESIGNATION OF EXPERTS

Pursuant to Federal Rules of Civil Procedure 26(a)(2) and this Courts Scheduling Order, Plaintiff hereby designates the following persons as expert witnesses who will testify at trial for the Plaintiff:

Retained Expert Witnesses

- 1. Robert C. Rankins M.D. 2810 S. Hardin Blvd. Ste. 100 McKinney, TX 75070-7490
- (i) A complete statement of all opinions this witness will express and the basis and reasons for them is attached hereto and incorporated herein in the expert report **Exhibit 1**.
- (ii) The facts or data considered by this witness in forming his opinions is contained in Plaintiff's medical records and identified in, attached hereto and incorporated herein in the expert report **Exhibit 1**.
- (iii) Any exhibits that will be used to summarize or support this witness's opinions is contained in Plaintiff's medical records and identified in, attached hereto and incorporated herein in expert report **Exhibit 1**.

- (iv) The witness's qualifications, including a list of all publications authored in the previous 10 years are described in the expert report Exhibit 1 and attached hereto and incorporated herein in the C.V. **Exhibit 2**.
- (v) A list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition are identified in the expert report **Exhibit 1**.
- (vi) A statement of the compensation to be paid for the study and testimony in the case described in the expert report **Exhibit 1** and attached hereto and incorporated herein in the Invoice **Exhibit 3**.

2. Steven M. Fass, M.D., F.A.C.S. 5809 Long Court Austin, TX 78730

- (i) A complete statement of all opinions this witness will express and the basis and reasons for them is attached hereto and incorporated herein in the expert report **Exhibit 4**.
- (ii) The facts or data considered by this witness in forming his opinions is contained in Plaintiff's medical records and identified in, attached hereto and incorporated herein in the expert report **Exhibit 4**.
- (iii) Any exhibits that will be used to summarize or support this witness's opinions is contained in Plaintiff's medical records and identified in, attached hereto and incorporated herein in expert report **Exhibit 4**.
- (iv) The witness's qualifications, including a list of all publications authored in the previous 10 years are described in the expert report Exhibit 1 and attached hereto and incorporated herein in the C.V. **Exhibit 5**.
- (v) A list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition are identified in the expert report **Exhibit 4**.
- (vi) A statement of the compensation to be paid for the study and testimony in the case described in the

expert report Exhibit 4 and attached hereto and incorporated herein in the Invoice **Exhibit 6**.

3. Allyn Needham, Ph.D., CEA 6320 Southwest Boulevard, Suite 113 Fort Worth, TX 76109

- (i) A complete statement of all opinions this witness will express and the basis and reasons for them is attached hereto and incorporated herein in the expert report **Exhibit 7**.
- (ii) The facts or data considered by this witness in forming his opinions is attached hereto and incorporated herein in **Exhibit 7** and **Exhibit 8**. Pursuant to FRCP 5.2, Plaintiff is withholding from ECF filing tax returns for 2009, 2010, 2011and 2012. Plaintiff is producing these tax returns to each Defendant under separate cover.
- (iii) Any exhibits that will be used to summarize or support this witness's opinions is attached hereto and incorporated herein in **Exhibit 8**. Pursuant to FRCP 5.2, Plaintiff is withholding from ECF filing tax returns for 2009, 2010, 2011and 2012. Plaintiff is producing these tax returns to each Defendant under separate cover.
- (iv) The witness's qualifications, including a list of all publications authored in the previous 10 years are attached hereto and incorporated herein in the C.V. **Exhibit 9**.
- (v) A list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition are identified in the expert report **Exhibit 9**.
- (vi) A statement of the compensation to be paid for the study and testimony in the case is attached hereto and incorporated herein in the Invoice **Exhibit 10**.

Plaintiff will use the above-referenced witnesses at trial to present evidence under Federal Rule of Evidence 702, 703 or 705. Plaintiff will supplement this designation in compliance with FRCP 26(e)(2).

Non-Retained Expert Witnesses

Plaintiff may use the following witnesses at trial to present evidence under Federal Rule of Evidence 702, 703 or 705. These witnesses are healthcare providers of Beth Cheney MacNeill but Plaintiff has no control over these witnesses and cannot compel them to provide information or to prepare expert reports. Plaintiff would refer Defendants to the medical records and/or deposition testimony generated by such individuals for the subject matter, factual information, mental impressions and opinions held or known by each such person or provider and for any summaries of the basis for their mental impressions and opinions and for any documents reflecting such information.

To the extent they may offer testimony favourable to the Plaintiff, Plaintiff designates and specifically incorporates the following physicians as experts to address the medical and/or causation and/or damages issues in this case including, but not limited to, the standard of medical care, causation, damages, and the fact that Defendants failed to follow the appropriate standards of medical care and were negligent, and that no alleged conduct on Plaintiff's behalf proximately caused any injury or damage to Plaintiff. Plaintiff may elicit opinion testimony from any of these individuals if called by any other party to this case or Plaintiff may call these individuals as experts.

To the extent that such experts offer testimony favourable to the Plaintiff, they are designated as experts to testify regarding their care and treatment of Beth Cheney MacNeill, including but not limited to, Beth Cheney MacNeill's prognosis, diagnosis, extent and/or duration of any injuries, disability, damages and proximate cause of any injuries sustained by Beth Cheney MacNeill made the basis of this suit. These individuals are expected to testify

whether the charges for the care and treatment provided by them to Beth Cheney MacNeill were reasonable and necessary. The facts known and opinions of these individuals are set forth in the medical and billing records of Beth Cheney MacNeill which records are incorporated into this designation the same as if fully set forth at length for all purposes. The facts known and opinions of these individuals are also set forth in the written, oral, and/or videotaped depositions of such experts, if any, taken in this case. Such depositions are incorporated into this designation the same as if fully set forth at length for all purposes.

- 4. Neal Talbott, M.D. 4613 Saldana Dr. Fort Worth, TX 76133
- 5. John Paul Evans, M.D. 4614 Cardona Court Fort Worth, TX 76126
- 6. Chad Joseph Carlton, M.D. 12680 Canyon Oaks Dr. Frisco, TX 75033
- 7. Domingo K. Tan, M.D. 2106 Royal Dominion Ct. Arlington, TX 76006
- 8. Nirmal Jayaseelan, M.D. 9221 Sunnybrook Lane Dallas, TX 75220

Subsequent Treating & Non-Retained Expert Witnesses

The following section lists and discloses experts pursuant to Fed.R.Civ.P. 26(a)(2)(C). The following disclosures state the subject matter on which the witnesses named below are to testify and a summary of the facts of opinions to which the witness is expected to testify. These include Plaintiff's related hospitalizations, related medical treatment and reasonable and necessary costs thereof. They include and are grouped and diagramed as follows:

- 1. 4/21/12 Endoscopy procedure at Forest Park.
- 2. 4/25/12 Filling of Lap Band by Jayaseelan.
- 3. 4/27/12 Fundo Plication by Jayaseelan.

- 4. 4/28/12 Ambulance transport to and treatment at Harris Fort Worth.
- 5. 4/29/12 Ambulance transfer to and treatment at Baylor Fort Worth.
- 6. 4/30/12 5/25/12 Stay at Forest Park under direction of Dr. Jayaseelan.
- 7. 5/25/12 6/6/12 Stay at Baylor Dallas under direction of Dr. Michael Foreman.
- 8. 6/7/12 6/13/12 Stay at Baylor Rehabilitation under direction of Dr. Rita Hamilton.
- 9. Plaintiff was followed up by her PCP, Dr. Mark Godfrey and had wound care from Dr. Maxine Theriot.
- 10. 7/3/12 Hernia repair by Dr. Jeffrey P. Bell.
- 11. 8/29/12 9/6/12 Upper GI Surgery with Dr. Blair Conner at Baylor in Dallas.
- 12. Various follow ups.

The doctors and healthcare providers listed herein will testify as to the necessity of the treatment as received by Mrs. MacNeill and the reasonable nature of the charges. Restated, those listed herein will testify as to the reasonable and necessary medical costs of the bills listed herein.

It should be noted, that in addition to the healthcare providers, who provided actual medical care, the following healthcare professionals that serve in the billing departments of the respective facilities will testify to the reasonableness of the costs of all medical care provided:

Harris Hospital: Lindia Connely-White 500 E. Border St. Arlington, TX 76010 682-236-3596

Baylor: Marilyn Carter Baylor Healthcare System 2001 Bryan St., Ste. 2600 Dallas, TX 75201 214-820-4521

Forest Park Medical Center: Rachel Loftin 11990 N. Central Expwy. Dallas, TX 75243 877-557-9519

A summary of the facts and opinions to which the witnesses are expected to testify are contained in the voluminous medical records which have been provided to defendants in this case. The content of those records are incorporated by reference as if fully included herein. Additionally, some of the providers and defendants have been deposed and the subject matter of their testimony is contained in those depositions.

The chart herein is designed to show the date, name of healthcare provider and service performed. Additionally, the charges are separated into the amounts charged by the provider and

the amount actually paid by the health insurance carrier. The charges are separated and subtotaled as per provider and institution.

The amounts herein were gleaned and removed from the Alcon insurance and billing records that were acquired by Deposition by Written Questions of September 5, 2014 and are incorporated herein. These records remain available and are in possession of all Defendants. Additionally, the medical care practitioners and other healthcare providers herein will testify as to the cause of Plaintiff's injuries and the relationship between the Defendants' actions and her injuries. They will further testify as to the nature of Plaintiff's pain and suffering in the past and future, mental anguish in the past and future, disfigurement in the past and future and how such limitations will directly cause a loss of wages in the past and wage earning capacity in the future.

All testimony will additionally be based on their training as doctors or other healthcare providers, their education, and in a reasonably medical probability.

4/21/12: Endoscopy at Forest Park.

NAME OF HOSPITAL ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/21/12 (Forest Park) Forest Park Medical Center 11990 North Central Expwy. Dallas, TX 75243	FOREST PARK Endoscopy Nirmal Jayaseelan 11970 N. Central Expwy., Ste. 670 Dallas, TX 75243	\$17,286.00 \$2,500.00	\$1,968.30 \$134.29
	Autumn Stoos, DO - Anesthesia Ascendant Anesthesia 12222 N. Central Expwy., Ste. 400 Dallas, TX 75243	\$1,200.00 \$1,168.00	\$1,080.00 \$1,051.20

Total: \$22,154.00 \$4,233.79

4/25/12: Dr. Jayaseelan lap-band fill. Billed for filling. Fill not performed.

NAME OF HOSPITAL ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/25/12 (Forest Park)	Nirmal Jayaseelan	\$2,000.00	\$800.00

4/27/12: Fundoplication surgery by Dr. Jayaseelan and Bobby Nguyen at Forest Park.

NAME OF HOSPITAL ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/27/12 (Forest Park)	FOREST PARK Outpatient Fundo Plication Surgery - Bobby Nguyen, RNFA (Assistant in Surgery) Bobby N. Nguyen, RNFA 1151 N. Buckner Blvd., Ste. 308A Dallas, TX 75218	\$5,430.85 \$5,000.00	\$1,096.34 \$1,078.87
	Anesthesia - Ascendant Anesthesia	\$2,550.00	\$2,295.00
	OP Misc. Services	\$40,321.00	\$8,716.50
	Michelle Hudson, Chief CRNA - Anesthesia and	\$2,782.00	\$2,503.80
	Surgery Misc. Services and Adjustment - FP Medical (pro)	\$40,675.00	\$574.40

Total: \$96,758.85 \$16,264.91

4/28/12: Medstar transport to Harris Fort Worth.

NAME OF HOSPITAL ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/28/12 (Home to HARRIS FW) MedStar Mobile Healthcare 551 E. Berry St. Fort Worth, TX 76110	Ambulance to Harris FW then home with Son on 4/29/12 @ 5 am - Medstar	\$1,635.00	\$1,471.50

4/29/12: Emergency room at Harris FW.

NAME OF HOSPITAL ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/29/12 (HARRIS FW) Texas Health Harris Methodist Hospital Fort Worth 1301 Pennsylvania Ave. Fort Worth, TX 76104	TX Health Harris OP Misc. Services	\$11,852.94	\$3,193.00
4/29/12 (HARRIS FW) Neal B. Talbott, MD Texas Medicine Resources 1301 Pennsylvania Ave. Fort Worth, TX 76104	OP Medical Visit, Provider - Neal Talbott	\$947.00	\$947.00

Total: \$12,799.94 \$4,140.00

Radiology charges for 4/29 - 4/30.

NAME OF HOSPITAL ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/29/12 Radiology Associates of North Texas 816 W. Cannon St. Fort Worth, TX 76104	Radiology Assoc. of North Texas	\$696.00 \$28.00 \$28.00 \$351.00 \$28.00 \$28.00	\$407.07 \$0 \$0 \$280.80 \$15.34 \$15.34
4/30/12	Radiology Assoc. of Texas	\$57.00 \$40.00	\$31.67 \$11.67

Total: \$1,256.00 \$761.89

4/29/12: Medstar transport to Baylor FW.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/29/12 (Home to Baylor) Medstar	Ambulance from home to Baylor FW @ 5 pm. Medstar Provider	\$1,675.00	\$1,507.50

4/29/12: Baylor FW ED and ICU.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/29 - 4/30/12 (Baylor FW) Baylor All Saints Medical Center at Fort Worth 1400 Eighth Ave. Fort Worth, TX 76104	Room and board/IH Misc. Services/ Baylor All Saints	\$28,903.23	\$3,371.53
4/29/12 after 5 pm - 4/30/12 (Baylor FW)	Tarrant Pathology Labs Services Tarrant Pathology Associates 1400 8 th Ave. Fort Worth, TX 76104	\$492.50	\$0
4/29/12 (Baylor FW) Charles A. Carlton, M.D. Texas Healthcare 1622 8 th Ave., Ste. 110 Fort Worth, TX 76104	OP Medical Visit, Provider - Charles A. Carlton	\$124.00	\$93.00
4/29/12 (Baylor FW) Northstar Anesthesia, PA 6225 N. State Hwy. 161, Ste. 200 Irving, TX 75038	Surgery - Provider - Northstar Anesthesia	\$840.00	\$233.28
4/29/12 (Baylor FW) Linda D. Gregory, DO 1400 8 th Ave. Fort Worth, TX 76104	Linda Gregory for Special Medical, Radiology Services and Surgery	\$2,437.00	\$2,193.30
4/29/12 (Baylor FW)	Inpatient (pro) for Special Medical	\$513.00	\$225.12
4/29/12 (Baylor FW) Steven Q. Davis, MD TX Pulmonary/Critical Care Consultants 1201 Fairmount Ave. Fort Worth, TX 76104	Steven Q. Davis, MD - Consultation	\$717.00	\$241.84

Total: \$34,026.73 \$6,358.07

4/30/12: MedStar transport from Baylor FW to Forest Park Medical in Dallas.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/30/12 (from Baylor FW to FP)	Ambulance from Baylor FW to FP Outpatient Clinic - MedStar	\$3,228.00	\$2,905.20

4/30/12: Dr. Jayaseelan perforation repair and treatment of complications.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
4/30/12 (FP)	FP OP Surgery - Texas Pulmonary (provider)	\$1,012.00	\$562.01
4/30/12 (FP)	Asst. Surgery - Bobby Nguyen	\$14,360.59	\$12,924.54
	Surgery - Nirmal Jayaseelan	\$15,000.00	\$1,641.52
4/30/12 (FP)	Radiology Services - Radiological (pro)	\$128.00	\$15.94
4/30/12 (FP)	Autumn Stoos, DO - Anesthesia	\$2,850.00	\$2,565.00
	Ascendant Anesthesia	\$2,774.00	\$2,496.60
4/30/12 - 5/25/12 (FP)	Room and Board \$ IH Misc. Services @ FP Outpatient	\$867,186.79	\$122,053.00
5/1/12 - 5/6/12 (FP) Allan N. Shulkin, MD Critical Care Pulmonologist 7777 Forest Ln., Ste. B202 Dallas, TX 75230	Allan N. Shulkin - Special Medical TO	\$3,840.00	\$1,511.52
5/2/12 (FP OP)	Surgery - Nirmal Jayaseelan	\$7,400.00	\$1,168.74
	Autumn Stoos, DO - Anesthesia and Adjustment	\$5,700.00	\$2,850.00
	Ascendant Anesthesia	\$5,548.00	\$2,774.00
	Inpatient Physician (pro) - Consultation Inpatient Physician Associates 6901 Snider Plaza #130 Dallas, TX 75205	\$300.00	\$118.69

5/7/12 (FP)	Surgery - Nirmal Jayaseelan Asst. Surgery - Bobby Nguyen	\$8,000.00 \$7,685.60	\$1,303.75 \$0
5/7/12 (FP)	Ascendant Anesthesia Autumn Stoos, DO	\$7,008.00 \$2,400.00	\$4,342.91 \$2,089.06
5/7/12 (FP)	Allan Shulkin - Surgery	\$525.00	\$202.56
5/7, 5/11/12 - 5/13/12 (FP)	Allan Shulkin - Special Medical TO	\$2,560.00	\$1,007.68
5/1/12 - 5/24/12 (FP)	Radiology Services - Radiological (pro)	\$2,822.00	\$469.65
5/14/12 - 5/15/12 (FP)	Allan Shulkin - Special Medical TO	\$1,280.00	\$503.84
5/17/1 2 - 5/22/12		\$3,840.00	\$1,511.52
5/23/12 - 5/24/12		\$1,280.00	\$503.84
5/15/12 - 5/17/12 (FP)	IN Medical Visit and Consult - Claire E. Brenner, MD	\$775.00	\$416.89
5/21/12 - 5/25/12	(Infectious Disease Medicine) Claire E. Brenner, MD 2241 Peggy Ln Ste. E, Garland, Texas 75042-5709	\$1,025.00	\$559.30
5/18/12 - 5/20/12 (FP) Dr. Serge Lartchenko, MD Infectious Disease and Travel Medicine Consultants 2821 E. President George Bush Hwy., Ste. 500 Richardson, TX 75082	Serge Lartchenko, MD - IH medical visit	\$615.00	\$335.58

Total: \$965,914.98 \$163,928.14

5/25/12: Texas Lifeline transfer from Forest Park Medical to Baylor Dallas.

Dallas, TX 75215

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
5/25/12 (FP to Baylor Dallas)	Ambulance - Texas Lifeline Corp	\$917.00	\$779.45
Texas Lifeline Corporation	(FP to Baylor Dallas - ICU)		
North Central Texas			
Operations Center:			
2424 S. Good-Latimer			
Expwy.			

5/25/12 - 6/6/12: Baylor Dallas ICU. Treating physician Dr. Michael Foreman (Urgent Surgery Care). Transferred to Baylor Rehab.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
5/25/12 - 6/5/12 (Baylor Dallas) Baylor University Medical Center at Dallas 3500 Gaston Ave. Dallas, TX 75246	Lab Services - Thomas P. Lohmann, MD Dr. Thomas P. Lohmann, MD Pathologists Bio - Medical Lab 3600 Gaston Ave., Ste. 261 Dallas, TX 75246	\$1,032.99	\$0
5/25/12 - 6/6/12 (Baylor Dallas)	Room and Board, IH Services, Misc. Services and Adjustment - Baylor University	\$88,942.75 \$89,157.88	\$0 \$66,868.41
5/26/12 (Baylor Dallas)	American Radiology - Diag. Services American Radiology Associates 712 N. Washington, Ste. 101 Dallas, TX 75246	\$467.00 \$124.00	\$156.21 \$48.41

5/26, 5/27, 5/31 (Baylor Dallas)	IH Medical Visit - Michael Foreman, MD, FACS Urgent Surgery Associates 2710 Swiss Ave. Dallas, TX 75204	\$745.00	\$345.00
5/26/12 (Baylor Dallas)	IH Medical Visit - (Pro) Edward Taylor Dr. Edward E. Taylor, MD, FACS Urgent Surgery Associates 2710 Swiss Ave. Dallas, TX 75204	\$400.00	\$360.00
5/27/12 (Baylor Dallas)	American Radiology - Radiology and Surgery	\$2,426.00	\$1,588.82
5/28/12 (Baylor Dallas)	American Radiology	\$32.00 \$32.00	\$12.65 \$0
5/28/12 - 6/5/12 (Baylor Dallas)	Lab Services - Thomas Lohmann	\$293.05	\$0
5/28/12 -5/30/12 (Baylor Dallas)	Geoffrey A. Funk - special medical, IH medical visit Geoffrey A. Funk, MD, FACS Urgent Surgery Associates 2710 Swiss Ave. Dallas, TX 75204	\$1,650.00	\$1,485.00
5/30/12 (Baylor Dallas)	Radiology Services - Radiological (pro)	\$76.00	\$27.14
5/31/12 (Baylor Dallas)	American Radiology - Radiological Services	\$250.00	\$97.90
6/1 - 6/6/12 (Baylor Dallas)	Michael Foreman - IH Medical Visit	\$750.00	\$675.00
6/2/12 (Baylor Dallas)	IH Medical Visit - James P. Carroll, MD, MPH, FACS Urgent Surgery Associates 2710 Swiss Ave. Dallas, TX 75204	\$180.00	\$180.00

6/3/12 (Baylor Dallas)	American Radiology - Radiological Services	\$435.00	\$143.56
6/4/12	American Radiology - Radiological Services	\$159.00	\$159.00
6/4/12	American Radiology - Radiological Services	\$96.00	\$18.98
6/6/12	American Radiology - Radiological Services	\$706.00	\$134.21
6/6/12 (Baylor Dallas) Baylor Diagnostic Imaging Center at Junius Baylor Medical Pavilion 3900 Junius St., Suite 100 Dallas, TX 75246	Baylor University - OP Misc. Services and Radiology Services	\$3,134.35	\$1,643.29

Total: \$191,089.02 \$73,943.58

6/7/12 - 6/13/12 Baylor Rehab. Treating physician Dr. Rita Hamilton.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
6/6 - 6/7/12 (Baylor Rehab)	Rita Hamilton - IN Medical Visit	\$335.00	\$239.89
Baylor Institute for Rehabilitation 909 N. Washington Dallas, TX 75246	Dr. Rita G. Hamilton, DO 909 N. Washington Ave., Ste. 113 Dallas, TX 75246		
6/8/12		\$110.00	\$78.76

6/9 - 6/10/12 (Baylor Rehab)	Dr. Leslie D. Porter - IH Medical Visit Dr. Leslie Dean Porter, MD Baylor Physical Medicine and Rehabilitation Physicians 909 N. Washington Dallas, TX 75246	\$320.00	\$223.58
6/11/12 (Baylor Rehab) 6/12/12	Rita Hamilton - IN Medical Visit	\$110.00 \$110.00	\$78.76 \$78.76
6/13/12 (Baylor Rehab)	Rita Hamilton - IN Medical Visit	\$145.00	\$94.48

Total: \$1,130.00 \$794.23

6/18/12: Mark Godfrey primary care physician.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
6/18/12 (Saginaw) Mark Godfrey 833 Towne Ct. Saginaw, TX 76179	Mark Godfrey Office Visits and Lab Services	\$304.00	\$123.29

6/20/12: Wound Care. Maxine Theriot treating physician.

NAME OF HOSPITAL/ENTITY	PROCEDURE/PHYSICIAN	CHARGED	PAID
ADDRESS AND PROVIDER			

6/20/12 (Irving)	Maxine Theriot - Office Visit, Diagnostic Services	\$175.00	\$0
Maxine Theriot			
North Texas Professional Wound Care Associates			
400 W. Lyndon B. Johnson Fwy. Plaza 1, Ste. 130			
Irving, TX 75063			

6/21/12: Medical Supplies

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
6/21/12 Prism Medical, Ltd. 10888 Metro Ct. St. Louis, MO 63043	Prism Medical (pro) - Medical Supplies	\$230.86	\$0

7/3/12: Hernia repair. Dr. Jeffrey Bell General Surgeon.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
7/3/12 (Arkansas) Jeffrey P. Bell General Surgeon Fayetteville Surgical Associates, PA 3264 N. North Hills Blvd. Fayetteville, AR 72703	Consultation & Surgery - Dr. Jeffrey P. Bell (pro)	\$404.00	\$221.36

8/8/12: Mark Godfrey primary care physician.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
8/8/12 (Saginaw)	Mark Godfrey Office Visit and Lab Services	\$361.00	\$137.53

8/29/12 - 9/6/12: Upper Gastrointestinal Surgery. Dr. Blair Connor treating physician. Per notes, EGD done on 9/13/12, but no charges identified yet.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
8/29/12 (Baylor Dallas) Blair Conner Digestive Health Associates of Texas, PA 411 N. Washington Ave. Dallas, TX 75246	Blair Conner, MD - Consultation	\$305.00	\$173.34
8/31/12 (Baylor Dallas)	Baylor University - Baylor Radiology Services ————————————————————————————————————	\$796.39 	\$557.47
9/6/12 (Baylor Dallas)	Baylor University - Surgery and Adjustment Blair Conner - Surgery	\$9,271.22 	\$1,573.55

9/6/12 (Baylor Dallas)	Pinnacle Anesthesia - Anesthesia	\$917.00	\$691.20
	Pinnacle Partners in Medicine		
	13737 Noel Road, Ste. 1400		
	Dallas, TX 75240		
	Laboratory Services - Nesrin		
	Onur, MD(pro)	\$348.00	\$136.10
	Dr. Nesrin Onur, MD		
	Pathologists Bio- Medical Lab		
	3600 Gaston Ave., Ste. 261		
	Dallas, TX 75246		

Total: \$12,558.61 \$3,689.31

10/2/12 - 10/15/12 : Baylor Dallas office visits to Godfrey and Theriot.

Dates of visits: Godfrey (10/2, 10/3) Theriot (10/8, 10/15).

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
10/2/12 (D1 D-11)	Maria California	¢101.00	¢00.67

10/2/12 (Baylor Dallas)	Mark Godfrey	\$191.00	\$90.67
	Office Visit		
	Immunization	\$77.00	\$39.83
	Maxine Theriot - Office Visit and Diagnostic Services	\$240.00	\$88.15
	Irving Laboratories - Laboratory Services	\$72.00	\$0
	Irving Laboratories, PA		
	Baylor Medical Center at Irving		
	1901 N. MacArthur Blvd.		
	Irving, TX 75061		
10/2/12 (Baylor Dallas)	Baylor University - Op Misc Radiology and Laboratory Services	\$5,685.60	\$1,747.75
	American Radiology - Radiology Services	\$435.00	\$143.56

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10/3/12 (Baylor Dallas)	Mark Godfrey - Laboratory Services	\$7.00	\$3.00
	USMD Diagnostic - Laboratory Services	\$41.00	\$16.40
	USMD Health System		
	6333 N. State Hwy. 161, Ste. 200		
	Irving, TX 75038		
10/8/12 (Baylor Dallas)	Maxine Theriot - Office Visits	\$140.00	\$47.30
10/15/12 (Baylor Dallas)	Maxine Theriot - Diagnostic	\$100.00	\$40.85
10/02/12 - 10/15/12 (Baylor Dallas)	Baylor Medical - OP Misc. And Laboratory Services	\$1,358.29	\$352.79

Total: \$8,346.89 \$2,570.30

10/17/12 - 10/26/12: CT image study (10/17). Hernia surgery on 10/22/12 performed by Dr. Arnold. Baylor hospitalization until 10/26/12.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
10/17/12 (Baylor Dallas) 10/22/12	David Arnold - Office Visits David Arnold - Surgery	\$54.00 \$2,450.00	\$46.95 \$1,030.02
David Arnold, MD (General Surgeon) 3808 Swiss Ave. Dallas, TX 75204			
10/22/12 (Baylor Dallas)	Pinnacle Anesthesia - Anesthesia	\$2,620.00	\$1,920.00
10/22 - 10/26/12 (Baylor Dallas)	Baylor University - Room and Board, Misc. Services, Adjustment	\$23,223.71 \$23,170.29	\$12,157.80 \$0

Total: \$51,518.00 \$15,154.77

8/6/13: Baylor Institute for Rehabilitation.

NAME OF HOSPITAL/ENTITY ADDRESS AND PROVIDER	PROCEDURE/PHYSICIAN	CHARGED	PAID
8/6/ 13 (BIR)	Special Medical - Baylor Institute for Rehabilitation	\$3,098.63	\$2,169.04

FINAL TOTAL: \$1,411,581.51 \$301,953.86

Respectfully Submitted,

By <u>/s/ Robert Hammer_</u>

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Michael J. Henry State Bar No. 09482300

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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2014 I electronically filed the foregoing with the Clerk for the U.S. District Court, Northern District of Texas, using the ECF system which will send notification of such filing to the following counsel of record:

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/s/Robert Hammer

Robert W. Hammer